



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 9, 2020

BY ECF

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Bomba*, 19 Cr. 463 (DLC)

Dear Judge Cote:

The Government has learned that the Court has determined that all trials scheduled to take place during the weeks of November 30, 2020 and December 7, 2020 should be adjourned due to concerns about the increased risk of transmission of COVID-19 following the Thanksgiving holiday. In light of this information, the Government and counsel for Emiliano Bomba jointly request that the Court adjourn the December 7, 2020 trial scheduled in the above-captioned case to March 15, 2021, when co-defendant David Maleh's trial is scheduled to begin. Should the Court grant the requested adjournment, the parties respectfully request that the Court exclude time from calculation under the Speedy Trial Act through March 15, 2021, to allow the parties time to continue to discuss a pre-trial resolution¹ and, in the event no resolution is reached, to prepare for trial.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/
Stephanie Lake / Sheb Swett / Aline Flodr
Assistant United States Attorneys
(212) 637-1066 / 6522 / 1110

cc: Telesforo Del Valle Jr., Esq. (by ECF)

¹ Consistent with defense counsel's August 14, 2020 letter to the court, (Dkt. 86), defense counsel has informed the Government that he anticipates that the defendant will plead guilty in advance of trial.